

ATTACHMENT 1
RESPONSE TO QUESTIONS 9, 10, 11, 12, 13, and 15

The Applicant is not affiliated with a foreign carrier in any of the destination countries for which authority is requested or with any dominant U.S. carrier whose services the Applicant may resell. Thus, pursuant to Section 63.10(a)(1) of the Commission's Rules, 47 C.F.R. § 63.10 (a)(1), the Applicant should be classified as a non-dominant carrier in its provision of international services on all routes.

Responses to Questions 9, 10, and 11:

This application qualifies for streamlined processing under Section 63.12 of the Commission's Rules, 47 C.F. R. § 63.12, because (1) the Applicant is not affiliated with a foreign carrier with market power in a destination country and is not affiliated with a dominant U.S. carrier whose international services Applicant seeks to resell; and (2) Applicant does not seek authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines. Applicant will not serve countries on the Commission's Exclusion List with facilities-based service or use satellite systems not on the Permitted Space Station list.

Response to Questions 12 and 13:

The Applicant therefore does not seek to provide international telecommunications services to any destination country where (1) the Applicant is a foreign carrier or controls a foreign carrier in that country; (2) where any entity that owns more than 25 percent of the Applicant, or that controls the Applicant, controls a foreign carrier in that country; or (3) where two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of the Applicant and are parties to, or the beneficiaries of, a contractual relation (*e.g.*, a joint venture or market alliance) affecting the provision or marketing of international basic telecommunications services in the United States.

Response to Question 15:

The Applicant has not previously received authority under Section 214 of the Communications Act. The Applicant is not seeking authority to provide services other than those authorized pursuant to Sections 63.18 (e) (1) and (e) (2). As shown in the response to Question 8, the Applicant does not seek to provide facilities-based service to Cuba. To the extent the provision of switched voice services provided over private lines to previously-authorized countries is not deemed to be covered under Section 63.18(e)(2), Applicant is not seeking to provide such service other than to previously-authorized countries.

The Applicant certifies that it will comply with the terms and conditions contained in Sections 63.21, 63.22, and 63.23 of the Commission's Rules.